

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed on May 17, 2005 ("Office Action"). In order to advance prosecution of this case, Applicant amends Claims 1, 9-12, 14, and 22-25 and Applicant adds new Claims 27-31. Applicant does not admit that any amendments are necessary due to any prior art. Applicant respectfully requests reconsideration and favorable action in this case.

Election/Restriction

The Examiner requires restriction to one of the following groups of claims pursuant to 35 U.S.C. § 121: (I) Claims 1-5, 9-10, 14-18, and 22-23; (II) Claims 6-8, 11-12, 19-21, and 24-25; or (III) Claims 13 and 26. In response to this restriction requirement, Applicant elects to proceed with the claims of Group 1, that is, Claims 1-5, 9-10, 14-18, and 22-23. This election is made without traverse.

Drawings

The Examiner requires corrected drawings in compliance with 37 C.F.R. § 1.121(d). In particular, the Examiner requires that FIGURE 1 be designated by a legend such as "Prior Art." A replacement sheet is submitted herewith for FIGURE 1. In the replacement sheet for FIGURE 1, the phrase "Prior Art" has been added.

Objections

The Examiner objects to Claims 9, 14, and 22 because of certain informalities. In particular, the Examiner suggests that the preamble of Claims 9 and 22 do not relate to the elements recited in Claims 9 and 22. In this Response, Claims 9 and 22 have been amended so that the preambles of Claims 9 and 22 relate to the elements recited therein.

The Examiner objects to Claim 14 on the basis that certain elements are inconsistent with each other. In this Response, Claim 14 is amended to recite, in part, "receiving a directory service query."

Claim Rejections - 35 U.S.C. § 103

The Examiner rejects Claims 1-5, 9-10, 14-18 and 22-23 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,356,892 issued to Corn, et al. ("*Corn*") in view of U.S. Patent No. 6,112,198 issued to Lohman, et al. ("*Lohman*"). Applicant respectfully requests reconsideration and allowance of Claims 1-5, 9-10, 14-18 and 22-23.

The *Corn-Lohman* combination fails to establish *prima facie* obviousness for at least two reasons. First, the *Corn-Lohman* combination is improper because the proposed combination would render *Corn* unsatisfactory for its intended purpose. Second, the *Corn-Lohman* combination fails to teach, suggest, or disclose "obtaining a sum of terms by expanding at least one nested term into one or more un-nested terms" as recited, in part, in amended Claim 1.

At the outset, the *Corn-Lohman* combination is improper because the proposed combination would render *Corn* unsatisfactory for its intended purpose. If a "proposed modification would render the prior invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification." MPEP § 2143.01. An "primary object" of *Corn* is to search a relational database to retrieve "target entries that exactly match given search criteria." (*Corn*; col. 2., ll. 32-38). *Corn* describes a method for mapping an LDAP search query into an SQL query. (*Corn*; col. 2, ll. 51-54). To formulate the SQL query, the method in *Corn* must generate "unique entry identifier (EID) sets." (*Corn*; col. 3, ll. 1-20). "Each LDAP entry is assigned a unique identifier (EID)" and the EIDs are stored in an "Entry Table" and an "Attribute Table." (*Corn*; col. 5, ll. 59-65; col. 6, ll. 16-22). The "Entry Table" stores each EID with entry data, and the "Attribute Table" stores each EID with attribute values. (*Corn*; col. 5, ll. 58-67; col. 6, ll. 16-22). *Corn* formulates SQL queries by incorporating terms associated with EIDs. In particular, *Corn* requires that the EID sets be "merged together, preferably into a single SQL query." (*Corn*; col. 7, ll. 42-44). For example, *Corn* presents the following SQL query:

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SELECT entry.EntryData, FROM LDAP_ENTRY as entry WHERE
entry.EID in (SELECT distinct LDAP_ENTRY.EID FROM
LDAP_ENTRY.ldap_desc WHERE (LDAP_ENTRY.EID=ldap_desc.DEID
AND ldap_desc.AEID=<id>) AND LDAP_ENTRY.EID NOT IN ((SELECT
EID FROM f1 where f1=' v1'))).
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(*Corn*; col. 11, ll. 10-20) (emphases added). Notably, this SQL query comprises numerous terms associated with EIDs. Therefore, to retrieve data using this query, *Corn* must search the EIDs associated with LDAP entries.

In contrast to *Corn*, the method in *Lohman* does not generate or store EIDs for each LDAP entry. Rather, *Lohman* describes a method for separating a query into “subtasks” and dividing a database into multiple “partitions.” (*Lohman*; col. 2, ll. 53-60). *Lohman* then applies each subtask to an individual partition of the database. (*Lohman*; col. 2, ll. 53-60). Combining *Corn* with *Lohman* would result in applying queries associated with EIDs to a database without EIDs. A query or subquery for particular EIDs, as described in *Corn*, will simply not return results from a database that does not comprise any EIDs, as described in *Lohman*. Thus, the proposed combination would render *Corn* inoperable and therefore unsatisfactory for its intended purpose of retrieving “target entries that exactly match given search criteria.” (*Corn*; col. 2, ll. 32-38). Because the proposed combination would render *Corn* unsatisfactory for its intended purpose, the combination is improper. As a result, Applicant respectfully requests that the Examiner withdraw the *Corn-Lohman* combination.

Even if the *Corn-Lohman* combination is not withdrawn, the combined references fail to teach, suggest, or disclose “obtaining a sum of terms by expanding at least one nested term into one or more un-nested terms” as recited, in part, in amended Claim 1. The Examiner relies on *Corn* for this aspect of amended Claim 1. *Corn* describes a method for mapping an LDAP search query into an SQL query. (*Corn*; col. 2, ll. 51-54). The method in *Corn*, however, retains the nested organization of the LDAP query. (*Corn*; col. 11, ll. 22-53). *Corn* provides an example of “a SQL statement generated for [a] complex query.” (*Corn*; col. 11, ll. 22-23). In this example, the query “SELECT EID FROM MEMBER” is nested within the query “SELECT EID FROM LDAP_ENTRY WHERE EID NOT IN,” which is nested within the query “LDAP_ENTRY.EID IN.” (*Corn*; col. 11, ll. 33-53). Thus, rather than expanding the query to a sum of terms, *Corn* maintains the query in its nested form. Because *Corn* maintains the nested query, *Corn* does not expand “at least one nested term into one or more un-nested terms” as recited, in part, in amended Claim 1. *Lohman* does not cure the deficiencies of *Corn*. Because the references do not teach, suggest, or disclose “obtaining a sum of terms by expanding at least one nested term into one or more un-nested terms” as recited, in part, in amended Claim 1, the rejection is improper.

In rejecting independent Claims 9, 14, and 22, the Examiner employs the same rationale used to reject amended Claim 1. Accordingly, for at least the reasons stated with respect to amended Claim 1, Applicant respectfully requests reconsideration and allowance of independent Claims 9, 14, and 22.

Claims 2-5, 10, 15-18, and 23 depend from independent claims shown above to be allowable. In addition, Claims 2-5, 10, 15-18, and 23 recite further limitations not taught, suggested, or disclosed by the *Corn-Lohman* combination. In particular, the proposed combination fails to teach, suggest, or disclose “expanding each term to remove NOT operators” as recited, in part, in Claim 2. The Examiner relies on *Corn* for this aspect of Claim 2. *Corn* describes a method for mapping an LDAP search query into an SQL query. (*Corn*; col. 2, ll. 51-54). *Corn*, however, does not teach the removal of NOT operators. Instead, *Corn* merely teaches the translation of an LDAP logical operator NOT to an SQL logical operator NOT IN. (*Corn*; col. 8, ll. 40-51). Notably, the SQL logical operator NOT IN comprises the LDAP logical operator NOT. Thus, the method in *Corn* retains the operator NOT as part of the SQL operator NOT IN. (*Corn*; col. 11, ll. 52). Because *Corn* fails to remove the operator NOT, *Corn* fails to teach, suggest, or disclose “expanding each term to remove NOT operators” as recited, in part, in Claim 2. Accordingly, *Corn* fails to support the rejection of Claim 2. For at least these reasons and those stated with respect to amended Claim 1, Applicant respectfully requests reconsideration and allowance of Claims 2-5, 10, 15-18, and 23.

CONCLUSION

For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Samir A. Bhavsar, Attorney for Applicant, at the Examiner's convenience at (214) 953-6581.

Enclosed is a check in the amount of \$250.00 to satisfy the filing fee requirements under 37 C.F.R. §1.11. Please credit any overpayment, or charge any additional fee required by this paper, to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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